United States Environmental Protection Agency POSITION DESCRIPTION COVERSHEET			Washington, DC			2. POSITION NUMBER N026014		
3. CLASSIFICATION	ON ACTION: a. Reference of Series and	d Date of Sta		Classify this Position	1	N026	014	
<b>Equal Employ</b>	ment Opportunity Series, G	GS-0260 T	S-49 Nov	ember 1980				
		b. Title			c. Pay Plan	d. Series	e. Grade	f. CLC
Official Allocation	EQUAL EMPLOYMENT	SPECIA	LIST		GS	0260	14	001
4. Supervisor's								
Recommendation	Equal Opportunity Specialist				GS	0360	14	
SENIOR RAC	NAL TITLE OF POSITION (if any)			6. NAME OF EMI Amanda Sweda	PLOYE			
7. ORGANIZATION (Give complete organizational breakdown)			e.					
a. U.S. ENVIRONMENTAL PROTECTION AGENCY			f.					
b. Office of the Adn	ninistrator			g.				
c. Office of Civil Rights				h. Employing Of A0D00000	fice Location			
d.								
a. 8. SUPERVISOR	RY STATUS							
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# Senior National Reasonable Accommodations Coordinator Equal Employment Specialist GS-0260-14

#### **INTRODUCTION**

The position is located in the Environmental Protection Agency (EPA), Office of the Administrator (AO), Office of Civil Rights (OCR), in Washington DC. The employee serves as the Senior National Reasonable Accommodations Coordinator (NRAC) and the program manager of the Reasonable Accommodation Program (RAP) for the Agency.

# **MAJOR DUTIES AND RESPONSIBILITIES**

- 1. The Senior NRAC provides high level oversight and management for the National Reasonable Accommodation Program and oversees the process by which the Agency complies with the mandated requirements of laws, policy, and regulations relating to the Rehabilitation Act of 1973 (Section 501) and Americans with Disabilities Act (ADA) as amended. The Senior NRAC develops and implements guidance and executable processes including case management processes to achieve measurable, consistent, efficient and effective reasonable accommodations. The Senior NRAC develops training programs, factsheets, frequently asked questions and other informational resource materials for employees, management, and other stakeholders in the RA process. The Senior NRAC maintains a working, neutral relationship with technical staffs (e.g., Local Reasonable Accommodation Coordinators (LORACs), Office of General Counsel (OGC), Labor Employee Relations (LER) staff, Program Management Officials (PMOs), etc.). The Senior NRAC trains EPA personnel on the RA process and speaks as an expert on RA in meetings and briefings, panels, boards, committees, depositions and those with other concerned groups.
- 2. In order to preserve confidentiality and prevent conflict of interest within EPA, the NRAC works with the requestor (employees and applicants) and the decision-maker throughout the reasonable accommodation process independently from any OCR management involvement or consultation. The NRAC analyzes confidential medical documentation to make a determination of disability by applying the Equal Employment Opportunity Commission's (EEOC) nine rules of construction. By determining and designating that an EPA employee is a person with a disability, the NRAC binds the Agency to providing reasonable accommodations for the person with a disability. The NRAC also prepares and presents the rationale for reasonable accommodation decisions made in controversial cases.
- 3. The Senior NRAC works in consultation with the Director and Deputy Director of the Office of Civil Rights (OCR) to provide guidance, advice and strategic planning of the RA Program, including assessing agency priorities, budget planning, and assessing risks. The Senior NRAC provides programmatic oversight and implementation of the program's policy and procedures which are administered by the senior NRAC, other

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OCR RA staff, and Agency LORACs (Local Reasonable Accommodation Coordinators). The Senior NRAC reports tracking, aggregate data of numbers, types of RAs, etc. to the Director and Deputy Director and other senior management (e.g., Deputy Civil Rights Officials, Program Management). The Senior NRAC, as the RA Program Manager, actively participates in OCR management meetings and deliberations with the Office Director, Deputy Office Director and Assistant Directors of the other OCR programs.

- 4. The Senior NRAC continuously evaluates the RA Program and process and examines laws, and headquarters' policies to identify relationships or applicability to the RA program. The Senior NRAC identifies areas for improvement, opportunities for partnerships, as well as problems; defines the nature and scope, and identifies possible approaches and remedies. The Senior NRAC communicates opportunities or problems to the OCR Director and Deputy Director and other senior management. The Senior NRAC provides historical insights and advice based on proven, as well as new techniques and procedures. The Senior NRAC provides guidance on alternatives and resolutions to problems and explains these specifically to stakeholders during an RA request and globally to the OCR Director, Deputy Director and other OCR staff and stakeholders. The Senior NRAC uses judgment and discretion in developing new program policy, automating a process, determining intent, and in interpreting and applying existing policy and regulatory guidance. The Senior NRAC provides management with new information and predictive advice concerning various alternative courses of action in resolving exceedingly complex problems.
- 5. Performs other duties as assigned

# FACTOR 1. KNOWLEDGE REQUIRED BY THE POSITION: Level 1-8 1550 Points

- Knowledge of law, policy, and regulations related to Americans with Disabilities Act (ADA) and Reasonable Accommodation (RA). Possesses an understanding of agency priorities and technical risks sufficient to provide guidance and advice to the Director and Deputy of the Office of Civil Rights (OCR); provides consultation and advice to supervisors and managers; and technical assistance to EPA employees and applicants. This knowledge is applied in the evaluation, planning, and conduct of comprehensive studies and the management of projects resulting in the development of recommendations and implementation of program policies having substantial impact on the operation of the RA program across the agency.
- Mastered knowledge of quantitative and qualitative techniques for analyzing, developing, and measuring effectiveness, efficiency, and productivity for accomplishing missions and skill in adapting those techniques, or coming up with new techniques to execute, measure, and improve effectiveness and organizational productivity of such assigned programs requiring a complex oversight process. This includes analyzing and identifying areas for improvement to ensure regulatory compliance.

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# **FACTOR 2. SUPERVISORY CONTROLS: Level 2-5**

650 Points

The Senior NRAC has delegated authority for development, implementation, and execution of oversight processes for the RA program for the Agency and acts independently of the Office Director and Deputy Office Director. The employee uses discretion and judgment in setting priorities and deadlines, establishing project objectives, and using approaches within the Program Analysis arena to accomplish program requirements. Duties and responsibilities are carried out with a high degree of professional independence and technical authority. Technical problems are resolved independently through formal and informal conferences where the incumbent provides expert judgment concerning the validity of assumptions and criteria by which alternatives will be evaluated. The work is reviewed by management only for influence on agency objectives and program goals, and recommendations are normally accepted without significant change.

# **FACTOR 3. GUIDELINES: Level 3-5**

650 Points

The Senior NRAC is required to interpret, adapt, refine, and develop policy and processes within the law and regulatory guidance for use by others within or outside the organization. The employee is a recognized subject matter expert in the development and interpretation of guidance on program planning, analysis, evaluation, design, implementation, and execution for efficiency and effectiveness of ADA and RA.

#### **FACTOR 4. COMPLEXITY: Level 4-6**

**450 Points** 

The Senior NRAC plans, organizes, and conducts analyses of the assigned programs which will impact other programs. Incumbent is required to develop independent approaches to design, develop, and execute programs when required data is difficult to retrieve and program functions/accomplishments are not available. The Senior NRAC provides leadership to all RA coordinators across the agency. Communicates with staff members at all levels to develop and implement executable policy and processes with accountability measures and controls, while overseeing the Agency's compliance status with the associated program laws, directives, and regulations. The implemented policies and processes of assigned programs involve the use of automation (case management, templates, etc.) wherever possible for efficiency and effectiveness.

# FACTOR 5. SCOPE AND EFFECT: Level 5-5

325 Points

The Senior NRAC develops and provides technical guidance and advice on the most appropriate method or procedure of analysis and evaluation to ensure optimum management strategy to provide reasonable accommodations for persons with disabilities. Formulates project methodology to identify operational and analytical techniques which accomplish project objectives and produce explicit findings/results. Foresees the pros and cons of alternative solutions and explains these to management and other personnel/analysts. The Senior NRAC's leadership as program manager and by completing RA requests contributes to the effective, efficient operation of the RA program for the

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Agency. Identifies and develops the necessary procedures and policy to ensure consistency, effectiveness and efficiency.

# FACTOR 6. PERSONAL CONTACTS AND FACTOR Level 3-C FACTOR 7. PURPOSE OF CONTACTS:

180 Points

The Senior NRAC works regularly with senior management and high-ranking officials agencywide. The Senior NRAC works as a neutral with Office of General Counsel, Labor Employee Relations (LER), Program Management Officers (PMOs) as well has all levels of management, and Unions. The purpose of contact is to obtain or exchange factual information. During or after development of complex policy, projects and studies, purpose of contacts will be to influence managers or other officials to accept and implement policy and recommendations on organizational improvement or program effectiveness, and to resolve controversial issues relating to compliance within the mission areas. Recommendations involve issues related to organization conflict, related to design or functions of mandated programs, and may significantly change the nature or scope of the organization. The Senior NRAC may also work with RA counterparts in the federal government to exchange ideas, processes, etc.

## FACTOR 8. PHYSICAL DEMANDS: Level 8-1

5 Points

Work performed involves sitting at a desk, sitting in conferences and meetings. No special physical demands are involved in performing the work. There may be occasional brief visits to other EPA sites during the reasonable accommodation process.

#### **FACTOR 9. WORK ENVIRONMENTS: Level 9-1**

5 Points

The work environment typically involves normal everyday low risks or discomforts typical of offices. Work areas are adequately lighted, heated, and ventilated. Requires occasional travel.

**Total Points: 3815**